

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Civil Action No. 04-11024-RWZ

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JEANNE DEGAN,  
Plaintiff

v.

GOLDWELL OF NEW  
ENGLAND, INC.,  
Defendant

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PLAINTIFF JEANNE DEGAN'S  
**FED. R. CIV. P. 26 DISCLOSURE STATEMENT**

Plaintiff Jeanne Degan hereby submits to the Defendant her initial disclosure in compliance with Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(A).

I. Individuals Likely to Have Discoverable Information

Pursuant to Fed. R. Civ. P. 26(a)(1)(A), Plaintiff states that she believes that the following individuals are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings:

1. Plaintiff has knowledge as to all facts alleged in the pleadings.
2. Vicky Burton has knowledge about Plaintiff's work environment.
3. David Hallgreen has knowledge of facts concerning the Defendant's claim that Plaintiff's position was eliminated.

4. Jan Slezak, M.D., has knowledge as to Plaintiff's injuries, treatment, and need for accommodation.
5. Mary Garneau has knowledge relating to the circumstances surrounding Plaintiff's termination.
6. John Foundras has knowledge relating to the circumstances surrounding Plaintiff's termination.
7. Sheryl Holladay has knowledge relating to the circumstances surrounding Plaintiff's termination.
8. Renee Shakour has knowledge relating to the circumstances surrounding Plaintiff's termination.

## II. Description of Documents

Pursuant to Fed. R. Civ. P. 26(a)(1)(B) and Local Rule 26.2, Plaintiff provides the following description of the categories of documents she possesses that are relevant to disputed facts alleged with particularity in the pleadings:

1. Plaintiff's Complaint
2. Plaintiff's Medical Records
3. Plaintiff's Personnel File
4. Plaintiff's Diary
5. Advertisements for Plaintiff's Position
6. Documents concerning Plaintiff's Job Duties.

III. Computation of Damages

Plaintiff hereby provides a computation of damages, pursuant to Fed. R. Civ. P. 26(C):

Plaintiff's damages are contingent on findings of fact and thus are not subject to precise computation. Plaintiff seeks past and future lost wages and lost bonuses and benefits caused by the Defendant's unlawful treatment of Plaintiff.

Plaintiff seeks emotional distress damages to be determined by a trier of fact. Plaintiff seeks punitive damages in an amount to be determined by a trier of fact. Plaintiff seeks interest to be determined by the clerk, clerk of court, and/or trier of fact. Plaintiff seeks attorney's fees and costs to be determined by the court and the clerk of the court

Conclusion

The above disclosures wholly satisfy the initial discovery requirements of Fed. R. Civ. P. 26(a)(1) and Local Rule 26.2(A).

Respectfully submitted,

The Plaintiff  
By her Attorneys,

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Rule26DisclosureStatement